IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant:	Thomas Vogt et al.	Examiner: Thomas Dailey	
Serial No.:	10/662,125	Group Art Unit: 2452	
Filed:	September 12, 2003	Docket: 2058.226US1	
Title:	Dynamic access of data		

REPLY BRIEF UNDER 37 C.F.R. § 41.41

Mail Stop Appeal Brief - Patents
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P.O. Box 1450
Alexandria, VA 22313-1450

This Reply is presented in response to the Examiner's Answer, dated April 9, 2009, which was sent in answer to Appellants' Appeal Brief, filed on December 29, 2008. Appellants' Appeal Brief was filed in response to the rejection of claims 1-50 of the above-identified application.

REMARKS

The Examiner's Answer ("Answer") dated April 9, 2009, includes substantially identical grounds for rejection as the last Final Office Action of claims 1-50 based on the Bodamer reference. Appellants respectfully maintain that the Appeal Brief, which is hereby incorporated by reference and reasserted in response, overcomes the original grounds of rejection. The particular clarifications to the previously presented grounds of rejection provided by the Examiner in the Answer are addressed below.

Discussion of the rejection of claims 1, 19, 20, 28, 35, 40-42, and 44 under 35 U.S.C. § 102(b) as being anticipated by Bodamer et al. (U.S. 6,236,997)

The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.,* 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim, but this is not an *ipsissimis verbis* test, i.e., identity of terminology is not required. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

In the Answer, the Examiner states that "user_catalog@FDS," as well as "user_catalog" correspond to "a client identifier" recited in claim 1.[1] The Examiner also states that "the metadata disclosed in Bodamer can be interpreted to include 'a maser identifier' as metadata is mapped to user_catalog."[2] "User_catalog" in Bodamer is the title of a table in the data dictionary for the local server.[3] "User_catalog" table stores certain metadata about the objects in the database. In a foreign database, as explained in Bodamer, there may be no table entitled "user_catalog," but the metadata about the objects in the foreign database may be spread across different tables. Contrary to the Examiner's assertion, Bodamer does not explicitly disclose mapping a title of a data dictionary table in the database of a local server ("user_catalog") to metadata stored in the data dictionary of a foreign database.

Furthermore, metadata about data objects stored in a data dictionary at a database server

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[1] Examiner's Answer, page 18, first incomplete paragraph.

[2] Examiner's Answer, page 18, first complete paragraph.

is distinct from the data objects stored in the associated database, which is illustrated in Bodamer

in Figure 3A showing the database server 208 and the associated database 308. Thus, because in

Bodamer the metadata stored in tables of the database server 208 is distinct from the associated

data objects stored in the database 308, such metadata does not read on the "master data object

from the master database" recited in claim 1. Thus, Bodamer, does not disclose "retrieve a

master data object from the master database based on the master identifier," as recited in claim 1.

Still further, in the Final Office Action mailed on July 23, 2008, the Examiner cites

mapping "the query" and the example of converting the client statement into a Sybase-compatible

query in Bodamer[4] to show the operation to "map the master data object to a mapped data object

based on a set of mapping rules associated with the client." As has been pointed out already in

the previous communications, mapping a query is distinct from mapping a data object.

Therefore, Bodamer fails to disclose this feature of claim 1.

Finally, the Examiner have not addressed the feature of claim 1 requiring that the

mapping of the master data object to a mapped data object is based on "a set of mapping rules

associated with the client." While Bodamer provides an example of converting the client

statement into a Sybase-compatible query,[5] Bodamer does not disclose any mapping rules that are

associated with the client.

Because Bodamer fails to disclose every element of claim 1 in as complete detail as is

contained in claim 1, claim 1 is patentable in view of Bodamer. It is respectfully requested that

the rejection be reversed.

The arguments articulated above are applicable, mutatis mutandis, to claims 19, 20, 28,

40-42, and 44. These claims and their respective dependent claims are therefore patentable in

view of Bodamer and should be allowed. It is respectfully requested that the rejection be

reversed.

Discussion of the rejection of claims 39 and 43 under 35 U.S.C. § 102(b) as being anticipated by

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[3] Bodamer, 8: 29-31.

[4] Final Office Action mailed on July 23, 2008, page 4, first paragraph.

[5] Bodamer, 8: 38-59.

REPLY BRIEF UNDER 37 C.F.R. § 41.41
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Mahajan (U.S. 6,226,650)

In the Answer, the Examiner reiterates that "if the two client's were to have the same data requirements in Mahanjan's (sic) system, they would subscribe to the same data groups and therefore be in the same functional group of clients."[6] The hypothetical scenario suggested by the Examiner where two clients may have the same data requirements does not amount to an operation of "placing" certain clients into a group or "placing the first client and clients who sent a set of characteristics that are the same as the first set of characteristics into a client group" recited in claim 39.

Claim 39 further recites "generating a data distribution path to allow updates of the set of characteristics to be sent to the client group." Mahajan, on the other hand, while permitting a client to request the modification files for the groups [of data] to which it subscribes,[7] does not contemplate sending an update to a group of clients.

Furthermore, the Examiner contends that Mahajan discloses "analyzing the first set of communications _to find a set of characteristics that the first client associates with a data object used in the first set of communications_" recited in claim 39, because Mahajan notes that the number and make up of the [data] groups may depend on constantly changing attributes such as the current set of transactions and the current set of connected clients. It is submitted that a generic reference to data groups being dependent on changing attributes does not amount to an operation to "_find a set of characteristics that the first client associates with a data object used in the first set of communications [received from the first client]_" recited in claim 39.

In the Answer, the Examiner does not address the feature of "analyzing other communications received from clients to find additional sets of characteristics that clients associate with data objects that have the same characteristics as the first set of characteristics" in order to place the first client and clients who sent a set of characteristics that are the same as the first set of characteristics into a client group, as recited in claim 39.

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[6] Examiner's Answer, page 21, first incomplete paragraph.

Thus, Mahajan fails to disclose at least the features of "placing the first client and clients who sent a set of characteristics that are the same as the first set of characteristics into a client group," "generating a data distribution path to allow updates of the set of characteristics to be sent to the client group," "analyzing the first set of communications to find a set of characteristics that the first client associates with a data object used in the first set of communications," and an operation to "find a set of characteristics that the first client associates with a data object used in the first set of communications [received from the first client]" recited in claim 39. Because Mahajan fails to disclose every element of claim 39 in as complete detail as is contained in claim 39, claim 39 is patentable in view of Mahajan. It is respectfully requested that the rejection be reversed.

Claim 43 is patentable in view of Mahajan and should be allowed for at least the reasons articulated with respect to claim 39. It is respectfully requested that the rejection be reversed.

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[7] Mahajan, 4: 15-29.

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Conclusion

The pending claims subject to this appeal are believed patentable. Appellants respectfully submit that the claims are in condition for allowance and request the Board issue an order to withdraw the rejection of claims 1-50.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

Respectfully submitted,

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CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being filed using the USPTO's electronic filing system EFS-Web, and is addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on this 15th day of April 2009.

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